

The Honorable Thomas S. Zilly

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

ELTON MASON, an individual, dba
WASHINGTON STATE TRUCKING, a sole
proprietorship

| No. 2:17-cv-00186-TSZ

**JOINT STIPULATION AND ORDER TO
ALLOW PLAINTIFF ADDITIONAL TIME
TO FILE THEIR AMENDED COMPLAINT**

Plaintiffs.

WASHINGTON STATE, a state governmental entity, WASHINGTON STATE DEPARTMENT of TRANSPORTATION, a political subdivision governmental entity; LYNN PETERSON, in her official and individual capacities, LINEA LAIRD, in her official and individual capacities, OFFICE OF MINORITY WOMEN BUSINESS ENTERPRISES, a subdivision governmental entity, SEATTLE TUNNEL PARTNERS, a Joint Venture Dragados, U.S.A., Tutor Perini Corporation, CHRIS DIXON, in his official and individual capacities, RUSSELL STREADBECK in his official and individual capacities.

Defendants.

IT IS HEREBY STIPULATED by and between Beverly Grant and Elizabeth Lunde, counsel for Plaintiff herein, and Robert W. Ferguson, Attorney General, Celeste Stokes, counsel for the state

Beverly Grant Law Firm, P.S.

BEVERLY GRANT LAW FIRM, P.S.
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University Place, WA. 98464
235-252-5454

1 Defendants, Nathan Bays and Patty Eakes, counsel for Seattle Tunnel Partners, a Joint Venture, Chris
2 Dixon, and Russel Streadbeck, that, subject to Court approval, Plaintiff be allowed an extension of
3 time to file their Amended Complaint for the above-titled matter for the following reasons:

4 On June 13, 2017, the Court dismissed Plaintiff's initial complaint. At that time, the Court
5 set a deadline of July 13, 2017 for filing an amended complaint. On June 29, 2017, Ms. Grant had
6 an unexpected and emergent surgery for a broken femur and knee and is still recovering. In light of
7 her medical condition, Plaintiff seeks to extend the deadline for filing an amended complaint to July
8 24, 2017. Opposing counsel has no objection to the extension and has stipulated to the request.

9 For the above reasons, and subject to Court approval, the parties hereby agree and stipulate that
10 the deadline for Plaintiff to file an amended complaint shall be extended to July 24, 2017.

11 DATED this 10 th day of July, 2017,

12 **BEVERLY GRANT LAW FIRM, P.S.**

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14 Beverly Grant, WSBA No. 8034
15 Elizabeth Lunde, WSBA No. 51565
16 Attorneys for Plaintiffs

17 **ROBERT W. FERGUSON**
18 Attorney General

CALFO EAKES & OSTROVSKY PLLC,

19 
20 Celeste T. Stokes, ESBA No. 12180
21 Attorneys for Defendants

/s/ Nathan Bays
22 Patricia A. Eakes, WSBA No. 18888
23 Nathan Bays, WSBA No. 43025
24 Attorneys for Defendants

Dated 7/10/17

Dated authorization for signature given 7/7/17 to atty EL

ORDER

IT IS HEREBY ORDERED that Plaintiff shall file the Amended Complaint on or before July 24, 2017.

DATED this 12th day of July, 2017.

Thomas S. Balle

Thomas S. Zilly
United States District Judge

Presented by:

BEVERLY GRANT LAW FIRM, P.S.

T. T.

Beverly Grant, WSBA No. 8034
Elizabeth Lunde, WSBA No. 51565
Attorneys for Plaintiffs

Approved as to form and notice of presentation waived:

ROBERT W. FERGUSON,
Attorney General

CALFO EAKES & OSTROVSKY PLLC

Celeste T. Stokes, ESBA No. 12180
Attorneys for Defendants

authorization for signature given 7/7/17 to
/s/ Nathan Bays atty EL